

UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF DELAWARE

RICHARD F. WHITE, JR.,	:	
	:	C.A. NO: 1:05-cv-53
Plaintiff,	:	
	:	DEMAND FOR JURY TRIAL
v.	:	
	:	
FEDERAL EXPRESS CORPORATION,	:	
	:	
Defendant.	:	

PLAINTIFF'S INITIAL DISCLOSURES
PURSUANT TO RULE 26(a)(1)

1. Give the name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying subjects of the information.

- A. **Dr. Peter Bandera**
11- B Trolley Square
Wilmington, DE 19806
(302) 777-7723
- Dr. Evan Crain**
Dr. Bruce Katz
Dr. Randeep Kahlon
First State Orthopaedics
4745 Ogletown-Stanton Road
Suites 225 & 238
Newark, DE 19713
(302) 731-2888
- Dr. James Moran**
Spine Care Delaware
4102 Ogletown-Stanton Road
Suites 225 & 238
Newark, DE 19713
(302) 894-1900

**Medical Personnel
Pro Physical Therapy
1812 Marsh Road, Suite 505
Wilmington, DE 19810
(302) 793-0432**

**Dr. Frank Falco
Mid Atlantic Pain Institute
100 Becks Woods Drive
Bear, DE 19701
(302) 392-6501**

**The personnel of Silverman, McDonald & Friedman
1010 N. Bancroft Parkway, Suite 22
Wilmington, DE 19805
(302) 888-2900**

2. Identify a copy of, or description by category and location of, all documents, data compilations, and tangible things that are in possession, custody, or control of the party that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

- A. **State of New Jersey Police Accident Report, Medical Records, and Plaintiff's attorney is in possession of nine color photographs showing the physical damage to Plaintiff's and Defendant's vehicles.**

3. Give a computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of the injuries suffered.


- A. **To be supplied.**

4. Identify for inspection and copying as under Rule 34 any insurance agreement under which any person carrying on any insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy a judgment.

A. **Harleysville Insurance Company of New Jersey**
Attn: Lynn Rauscher
P.O. Box 1016
Moorestown, NJ 08057
Claim No.: MO462323
(888)595-9876 Ext.2333

Further insurance information will be provided upon identification.

SILVERMAN, MCDONALD & FRIEDMAN

By: 
Michael T. Silverman, Esquire (#3034)
Robert C. McDonald, Esquire (#2340)
1010 N. Bancroft Parkway, Suite 22
Wilmington, DE 19805
(302) 888-2900
Attorney for Plaintiff

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DEMAND FOR JURY TRIAL

CERTIFICATE OF SERVICE

I, Michael I. Silverman, Esquire hereby certify that the attached Plaintiff's Initial Disclosures Pursuant to Rule 26(a)(1) were served this 22nd day of April, 2005, via Federal Court E-filing and United States Mail, first class, postage pre-paid upon:

David G. Culley, Esquire
Tybout, Redfern & Pell
300 Delaware Avenue
P.O. Box 2092
Wilmington, DE 19899

SILVERMAN, MCDONALD & FRIEDMAN

By: 

Michael I. Silverman, Esquire (#3034)
Robert C. McDonald, Esquire (#2340)
1010 N. Bancroft Parkway, Suite 22
Wilmington, DE 19805
(302) 888-2900
Attorney for Plaintiff